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T.R.A. DOCKET ROOM

August 2, 2004

Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: TRA Docket No. 04-00193
Section 254(e) Certification of Citizens Telecommunications Company of the Volunteer
State LLC to Receive USF Disbursements in Calendar Year 2005

Dear Chairman Tate.

Enclosed please find:

1. Certification letter signed by Gregg C. Sayre (Attachment A), certifying that Citizens Telecommunications Company of the Volunteer State LLC (the "Company") is in compliance with the requirements of Section 254 (e) and the requirements established by the Commission in *the Matter of Federal-State Joint Board on Universal Service*, CC Docket Nos 96-45 and 00-256, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45 and Report and Order in CC Docket No 00-256 (FCC 01-157) (released May 23, 2001) ("Order") and codified at 47 C.F.R. § 54.314.
2. Statement of 2003 federal Universal Service receipts subject to certification and the 2003 expenditures for provision, maintenance and upgrading of facilities and services supported by federal Universal Service funding (Attachment B).

Also enclosed are 13 copies of the filing along with an additional copy of this letter to be date-stamped and returned in the envelope provided. If there are any questions, please direct to me at 585-777-2778 or Mike Swatts at 304-325-1216.

Sincerely,

Christanne R. Schey
Regulatory Analyst – Pricing & Tariffs

C Mike Swatts

Enclosure



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ATTACHMENT A

August 2, 2004

Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: TRA Docket No. 04-00193
Section 254(e) Certification of Citizens Telecommunications Company of the Volunteer
State LLC to Receive USF Disbursements in Calendar Year 2005

Dear Chairman Tate.

I, Gregg C. Sayre, Assistant Secretary of Citizens Telecommunications Company of the Volunteer
State LLC (the "Company"), do hereby certify under penalty of perjury that the following is true
and accurate to the best of my knowledge and belief:

- 1 I am the Assistant Secretary of the Company;
2. The Company is a "rural telephone company" as defined in 47 U.S.C § 153(37),
subject to the jurisdiction of the Tennessee Regulatory Authority,
- 3 The Company is eligible for disbursements from the federal Universal Service Fund
("USF") as prescribed by the Federal Communications Commission ("FCC"), and
- 4 The Company will utilize its USF disbursements for high cost support (including any
high cost loop support, local switching support, high cost support received pursuant
to the purchase of exchanges, high cost model support, and hold harmless support)
received in 2005 only for the provision, maintenance, and upgrading of facilities and
services for which the support is intended, consistent with Section 254(e) of the
Communications Act of 1934, as amended.

Sincerely yours,

Gregg C. Sayre
Assistant Secretary

Attachment B to Affidavit
Citizens Telecommunications Company of the Volunteer State LLC

Year 2003 Federal Universal Service Receipts Subject To Certification.

1 High cost loop support	\$9,677
2 Local switching support	\$467,955
3 TOTAL	\$477,632

Year 2003 Expenditures For Provision, Maintenance, and Upgrading Of Facilities and Services Supported By Federal Universal Service Funding

		<u>Source</u>
Plant Specific Operations Expenses		
4 Network support (Accts 6110-16)	\$5	[a]
5 General support (Accts 6120-24)	\$752,775	[a]
6 Central office (Accts 6210-6215)	\$363,153	[a]
7 Cable and wire facilities (Accts 6410-6441)	\$645,533	[a]
8 Network operations (Accts 6530-35)	\$935,073	[b]
9 Depreciation & amortization (Accts 6560-65)	\$4,358,214	[b]
10 Customer Operations Expenses		
11 Customer services (Accts 6620-23)	\$864,602	[b]
Corporate Operations Expenses		
12 Executive and planning (Accts 6710-12)	\$105,615	[b]
13 General and administrative (Accts 6720-28)	\$737,406	[b]
14 Total Year 2003 Supported Expenses, Before Return on Investment	\$8,762,376	
Additions		
15 Total central office switching (Acct 2210)	\$194,958	[c]
16 Total cable and wire (Acct 2410)	\$1,721,909	[c]
17 TOTAL	\$1,916,867	
18 Total Year 2003 Supported Expenditures Before Return On Investment	\$10,679,243	

[a] 2003 Annual Report CTC-VS Page 9
[b] 2003 Annual Report CTC-VS Page 10
[c] 2003 Annual Report CTC-VS Page 4